

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

ANDREA COCHRAN

No. 2:24-mj-00208-KFW

**FINAL JOINT MOTION TO EXTEND TIME  
TO INDICT UNDER THE SPEEDY TRIAL ACT**

The United States of America and Andrea Cochran (hereinafter, “defendant”), through her undersigned counsel, Matthew Crockett, Esq., hereby move that the Court enter an order under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), excluding the time between August 20, 2025, and September 5, 2025, and extending the date by which the government must indict the defendant until September 5, 2025. In support of this Motion, the parties state the following:

The defendant is charged by complaint with one count of violating Title 18, United States Code, Section 1543, and one count of violating Title 18, United States Code, Sections 1028A(a)(1) and 1028A(b). The defendant made her initial appearance before Judge Wolf on July 18, 2024, and was ordered detained. The defendant currently remains in federal custody.

The defendant has signed a plea agreement, which has been filed with the Court, and has agreed to plead guilty to a multi-count information. Waver of indictment and arraignment on the information have been scheduled for August 28, 2025. The requested extension of the deadline to indict and the exclusion of the time would permit the matter to be presented to a grand jury in September 2025, if necessary. Absent the requested order, but for the defendant’s speedy trial waiver in the executed plea agreement, the government would be required to present this case for indictment on August 20, 2025. The parties seek this extension out of an abundance of caution.

Defense counsel represents that the defendant is aware of her Speedy Trial Act rights and has authorized counsel to seek the extension requested by this joint motion. By the

signature of her counsel below, the defendant waives her rights under the Speedy Trial Act to have this matter presented to a grand jury within thirty days of her arrest, consents to the extension of time to indict, and consents to the exclusion of time as requested herein.

The interests of justice to be served by the requested exclusion of time and the requested extension of time to indict outweigh the interests of the defendant and the public in a speedy trial because the matter is now scheduled for a waiver of indictment and arraignment on an information that would promote a speedy and certain resolution of the case. For these reasons, the ends of justice are served by the requested extension of the Speedy Trial Act deadline for indictment and the exclusion of the time from August 20, 2025, to September 5, 2025.

WHEREFORE, the parties respectfully request that the Court enter an order excluding the period of time between August 20, 2025, and September 5, 2025, from calculation under the Speedy Trial Act and extending the date by which the government must indict the defendant through September 5, 2025.

Respectfully submitted,

FOR THE UNITED STATES:

Craig M. Wolff  
Acting United States Attorney

Dated: August 20, 2025

BY: /s/ Nicholas Heimbach  
Nicholas Heimbach  
Assistant United States Attorney  
United States Attorney's Office  
100 Middle Street, East Tower, 6<sup>th</sup> Floor  
Portland, Maine 04101  
(207) 780-3257  
Nicholas.Heimbach@usdoj.gov

FOR THE DEFENDANT:

Dated: August 20, 2025

/s/ Matthew Crockett  
Matthew A. Crockett, Esq.  
92 Auburn Street  
Suite J #1214  
Portland, ME 04103

(207) 200-5958  
Matthew@mccrockettlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2025, I electronically filed the Final Joint Motion to Extend Time to Indict with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

Matthew A. Crockett, Esq.  
Counsel for Defendant

Craig M. Wolff  
Acting United States Attorney

BY: /s/ Nicholas Heimbach  
Nicholas Heimbach  
Assistant United States Attorney  
United States Attorney's Office  
100 Middle Street, East Tower, 6<sup>th</sup> Floor  
Portland, Maine 04101  
(207) 780-3257  
Nicholas.Heimbach@usdoj.gov